

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

CAROLE DIANE HUYCK
2249 Valiant Avenue
Glendora, CA 91741
Registered Nurse License No. 240356
Public Health Nurse Certificate No. PHN19718

Respondent.

Case No. 2007-128

O.A.H. No. 2007090123

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on June 13, 2008.

It is so ORDERED MAY 13, 2008.

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FOR THE BOARD OF REGISTERED NURSING

DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
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4 300 So. Spring Street, Suite 1702
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6

7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

12 CAROLE DIANE HUYCK
2249 Valiant Avenue
13 Glendora, CA 91741
Registered Nurse License No. 240356
14 Public Health Nurse Certificate No. PHN19718

15 Respondent.

Case No. 2007-128

O.A.H. No. 2007090123

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
18 above-entitled proceedings that the following matters are true:

19 PARTIES

20 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of
21 the Board of Registered Nursing (Board). She brought this action solely in her official capacity
22 and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of
23 California, by Shawn P. Cook, Deputy Attorney General.

24 2. Respondent Carole Diane Huyck (Respondent) is represented in this
25 proceeding by attorney Richard G. Osborn, whose address is 8300 Utica Avenue, Third Floor
26 Rancho Cucamonga, CA 91730.

27 3. On or about February 28, 1974, the Board issued Registered Nurse License
28 No. 240356 (License) to Carole Diane Huyck (Respondent). The License was in full force and

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1 effect at all times relevant to the charges brought in Accusation No. 2007-128 and will expire on
2 March 31, 2008, unless renewed.

3 4. On or about July 12, 1974, the Board issued Public Health Nurse
4 Certificate No. PHN19718 (Certificate) to Carole Diane Huyck (Respondent). The Public
5 Health Nurse Certificate was in full force and effect at all times relevant to the charges brought in
6 Accusation No. 2007-128 and will expire on March 31, 2008, unless renewed.

7 JURISDICTION

8 5. Accusation No. 2007-128 was filed before the Board of Registered
9 Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent.
10 The Accusation and all other statutorily required documents were properly served on Respondent
11 on November 22, 2006. Respondent timely filed her Notice of Defense contesting the
12 Accusation. A copy of Accusation No. 2007-128 is attached as exhibit A and incorporated
13 herein by reference.

14 ADVISEMENT AND WAIVERS

15 6. Respondent has carefully read, fully discussed with counsel, and
16 understands the charges and allegations in Accusation No. 2007-128. Respondent has also
17 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
18 Settlement and Disciplinary Order.

19 7. Respondent is fully aware of her legal rights in this matter, including the
20 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
21 counsel at her own expense; the right to confront and cross-examine the witnesses against her;
22 the right to present evidence and to testify on her own behalf; the right to the issuance of
23 subpoenas to compel the attendance of witnesses and the production of documents; the right to
24 reconsideration and court review of an adverse decision; and all other rights accorded by the
25 California Administrative Procedure Act and other applicable laws.

26 8. Respondent voluntarily, knowingly, and intelligently waives and gives up
27 each and every right set forth above.

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CULPABILITY

9. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a prima facie case for the charges in Accusation No. 2007-128. Without admitting to those charges, Respondent hereby gives up her right to contest those charges.

10. Respondent agrees to submit her License and Certificate to discipline and she agrees to be bound by the Board of Registered Nursing (Board) 's imposition of discipline as set forth in the Disciplinary Order below.

RESERVATION

11. The stipulations made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board of Registered Nursing or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

12. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

13. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

1 14. In consideration of the foregoing admissions and stipulations, the parties
2 agree that the Board may, without further notice or formal proceeding, issue and enter the
3 following Disciplinary Order:

4 **DISCIPLINARY ORDER**

5 IT IS HEREBY ORDERED that Registered Nurse License No. 240356 and Public
6 Health Nurse Certificate No. PHN19718 issued to Respondent Carole Diane Huyck are revoked.
7 However, the revocations are stayed and Respondent is placed on probation for three (3) years on
8 the following terms and conditions.

9 **Severability Clause.** Each condition of probation contained herein is a separate
10 and distinct condition. If any condition of this Order, or any application thereof, is declared
11 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
12 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
13 and enforceable to the fullest extent permitted by law.

14 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.
15 A full and detailed account of any and all violations of law shall be reported by Respondent to
16 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
17 compliance with this condition, Respondent shall submit completed fingerprint forms and
18 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
19 as part of the licensure application process.

20 **Criminal Court Orders:** If Respondent is under criminal court orders, including
21 probation or parole, and the order is violated, this shall be deemed a violation of these probation
22 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

23 2. **Comply with the Board's Probation Program.** Respondent shall fully
24 comply with the conditions of the Probation Program established by the Board and cooperate
25 with representatives of the Board in its monitoring and investigation of the Respondent's
26 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
27 within no more than 15 days of any address change and shall at all times maintain an active,
28 current license status with the Board, including during any period of suspension.

1 Upon successful completion of probation, Respondent's license and certificate shall be fully
2 restored.

3 **3. Report in Person.** Respondent, during the period of probation, shall
4 appear in person at interviews/meetings as directed by the Board or its designated
5 representatives.

6 **4. Residency, Practice, or Licensure Outside of State.** Periods of
7 residency or practice as a registered nurse outside of California shall not apply toward a reduction
8 of this probation time period. Respondent's probation is tolled, if and when she resides outside
9 of California. Respondent must provide written notice to the Board within 15 days of any change
10 of residency or practice outside the state, and within 30 days prior to re-establishing residency or
11 returning to practice in this state.

12 Respondent shall provide a list of all states and territories where she has ever been
13 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
14 provide information regarding the status of each license and any changes in such license status
15 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
16 new nursing license during the term of probation.

17 **5. Submit Written Reports.** Respondent, during the period of probation,
18 shall submit or cause to be submitted such written reports/declarations and verification of actions
19 under penalty of perjury, as required by the Board. These reports/declarations shall contain
20 statements relative to Respondent's compliance with all the conditions of the Board's Probation
21 Program. Respondent shall immediately execute all release of information forms as may be
22 required by the Board or its representatives.

23 Respondent shall provide a copy of this Decision to the nursing regulatory agency
24 in every state and territory in which she has a registered nurse license.

25 **6. Function as a Registered Nurse.** Respondent, during the period of
26 probation, shall engage in the practice of registered nursing in California for a minimum of 24
27 hours per week for 6 consecutive months.

28 For purposes of compliance with the section, "engage in the practice of registered

1 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
2 work in any non-direct patient care position that requires licensure as a registered nurse.

3 The Board may require that advanced practice nurses engage in advanced practice
4 nursing for a minimum of 24 hours per week for 6 consecutive months.

5 If Respondent has not complied with this condition during the probationary term,
6 and Respondent has presented sufficient documentation of her good faith efforts to comply with
7 this condition, and if no other conditions have been violated, the Board, in its discretion, may
8 grant an extension of Respondent's probation period up to one year without further hearing in
9 order to comply with this condition. During the one year extension, all original conditions of
10 probation shall apply.

11 **7. Employment Approval and Reporting Requirements.** Respondent
12 shall obtain prior approval from the Board before commencing or continuing any employment,
13 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
14 performance evaluations and other employment related reports as a registered nurse upon request
15 of the Board.

16 Respondent shall provide a copy of this Decision to her employer and immediate
17 supervisors prior to commencement of any nursing or other health care related employment.

18 In addition to the above, Respondent shall notify the Board in writing within
19 seventy-two (72) hours after she obtains any nursing or other health care related employment.

20 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
21 terminated or separated, regardless of cause, from any nursing, or other health care related
22 employment with a full explanation of the circumstances surrounding the termination or
23 separation.

24 **8. Supervision.** Respondent shall obtain prior approval from the Board
25 regarding Respondent's level of supervision and/or collaboration before commencing or
26 continuing any employment as a registered nurse, or education and training that includes patient
27 care.

28 Respondent shall practice only under the direct supervision of a registered nurse

1 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
2 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
3 are approved.

4 Respondent's level of supervision and/or collaboration may include, but is not
5 limited to the following:

6 (a) Maximum - The individual providing supervision and/or collaboration is
7 present in the patient care area or in any other work setting at all times.

8 (b) Moderate - The individual providing supervision and/or collaboration is in
9 the patient care unit or in any other work setting at least half the hours Respondent works.

10 (c) Minimum - The individual providing supervision and/or collaboration has
11 person-to-person communication with Respondent at least twice during each shift worked.

12 (d) Home Health Care - If Respondent is approved to work in the home health
13 care setting, the individual providing supervision and/or collaboration shall have person-to-
14 person communication with Respondent as required by the Board each work day. Respondent
15 shall maintain telephone or other telecommunication contact with the individual providing
16 supervision and/or collaboration as required by the Board during each work day. The individual
17 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
18 site visits to patients' homes visited by Respondent with or without Respondent present.

19 **9. Employment Limitations. Employment Limitations.** Respondent shall
20 not work for a nurse's registry, in any private duty position as a registered nurse, a temporary
21 nurse placement agency, a traveling nurse, or for an in-house nursing pool.

22 Respondent shall not work for a licensed home health agency as a visiting nurse
23 unless the registered nursing supervision and other protections for home visits have been
24 approved by the Board. Respondent shall not work in any other registered nursing occupation
25 where home visits are required.

26 Respondent shall not work in any health care setting as a supervisor of registered
27 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
28 nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program. Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If Respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether there should be restrictions on the hours of work.

10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term.

Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above required course(s). The Board shall return the original documents to Respondent after photocopying them for its records.

11. **Cost Recovery.** Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$6,500.00. Respondent shall be permitted to pay these costs in a payment plan approved by the Board, with payments to be completed no later than three months prior to the end of the probation term.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation will apply.

12. **Violation of Probation.** If Respondent violates the conditions of her probation, the Board after giving Respondent notice and an opportunity to be heard, may set

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1 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's
2 license.

3 If during the period of probation, an accusation or petition to revoke probation has
4 been filed against Respondent's license or the Attorney General's Office has been requested to
5 prepare an accusation or petition to revoke probation against Respondent's license, the
6 probationary period shall automatically be extended and shall not expire until the accusation or
7 petition has been acted upon by the Board.

8 13. **License Surrender.** During Respondent's term of probation, if she ceases
9 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
10 probation, Respondent may surrender her license to the Board. The Board reserves the right to
11 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
12 take any other action deemed appropriate and reasonable under the circumstances, without
13 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
14 will no longer be subject to the conditions of probation.

15 Surrender of Respondent's license shall be considered a disciplinary action and
16 shall become a part of Respondent's license history with the Board. A registered nurse whose
17 license has been surrendered may petition the Board for reinstatement no sooner than the
18 following minimum periods from the effective date of the disciplinary decision:

19 (1) Two years for reinstatement of a license that was surrendered for any
20 reason other than a mental or physical illness; or

21 (2) One year for a license surrendered for a mental or physical illness.

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ACCEPTANCE


I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Richard G. Osborn. I understand the stipulation and the effect it will have on my Registered Nurse License, and Public Health Nurse Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: Feb 15, 2008


CAROLE DIANE HUYCK
Respondent

I have read and fully discussed with Respondent Carole Diane Huyck the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: Feb 15, 2008


RICHARD G. OSBORN
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: Feb. 15, 2008

EDMUND G. BROWN JR., Attorney General
of the State of California

MARC D. GREENBAUM
Supervising Deputy Attorney General

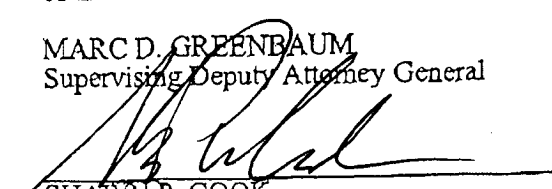

SHAWN P. COOK
Deputy Attorney General
Attorneys for Complainant

Exhibit A
Accusation No. 2007-128

1 BILL LOCKYER, Attorney General
of the State of California
2 GLORIA A. BARRIOS, State Bar No. 94811
Supervising Deputy Attorney General
3 California Department of Justice
300 So. Spring Street, Suite 1702
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5 Facsimile: (213) 897-2804

6 Attorneys for Complainant

7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2007-128

12 CAROLE DIANE HUYCK
2249 Valiant Avenue
Glendora, CA 91741

A C C U S A T I O N

13 Registered Nurse License No. 240356
Public Health Nurse Certificate No. PHN19718

14 Respondent.

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16 Complainant alleges:

17 **PARTIES**

18 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation
19 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
20 Department of Consumer Affairs.

21 2. On or about January 1, 1974, the Board of Registered Nursing issued
22 Registered Nurse License No. 240356 to Carole Diane Huyck (Respondent). The Registered
23 Nurse License was in full force and effect at all times relevant to the charges brought herein and
24 will expire on March 31, 2008, unless renewed.

25 3. On or about July 12, 1974, the Board of Registered Nursing issued Public
26 Health Nurse Certificate No. PHN19718 to Respondent. The Public Health Nurse Certificate
27 was in full force and effect at all times relevant to the charges brought herein and will expire on
28 March 31, 2008, unless renewed.

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4. This Accusation is brought before the Board of Registered Nursing

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5. Section 2750 of the Business and Professions Code (Code) provides, in

6. Section 2764 of the Code provides, in pertinent part, that the expiration of

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"The board may take disciplinary action against a certified or licensed nurse or

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"(1) Incompetence, or gross negligence in carrying out usual certified or licensed

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"As used in Section 2761 of the code, 'gross negligence' includes an extreme

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1 9. California Code of Regulations, title 16, section 1443, states:

2 "As used in Section 2761 of the code, 'incompetence' means the lack of possession
3 of or the failure to exercise that degree of learning, skill, care and experience ordinarily possessed
4 and exercised by a competent registered nurse as described in Section 1443.5."

5 10. California Code of Regulations, title 16, section 1443.5 states:

6 "A registered nurse shall be considered to be competent when he/she consistently
7 demonstrates the ability to transfer scientific knowledge from social, biological and physical
8 sciences in applying the nursing process, as follows:

9 "(1) Formulates a nursing diagnosis through observation of the client's physical
10 condition and behavior, and through interpretation of information obtained from the client and
11 others, including the health team.

12 "(2) Formulates a care plan, in collaboration with the client, which ensures that
13 direct and indirect nursing care services provide for the client's safety, comfort, hygiene, and
14 protection, and for disease prevention and restorative measures.

15 "(3) Performs skills essential to the kind of nursing action to be taken, explains
16 the health treatment to the client and family and teaches the client and family how to care for the
17 client's health needs.

18 "(4) Delegates tasks to subordinates based on the legal scopes of practice of the
19 subordinates and on the preparation and capability needed in the tasks to be delegated, and
20 effectively supervises nursing care being given by subordinates.

21 "(5) Evaluates the effectiveness of the care plan through observation of the
22 client's physical condition and behavior, signs and symptoms of illness, and reactions to
23 treatment and through communication with the client and health team members, and modifies the
24 plan as needed.

25 "(6) Acts as the client's advocate, as circumstances require, by initiating action to
26 improve health care or to change decisions or activities which are against the interests or wishes
27 of the client, and by giving the client the opportunity to make informed decisions about health
28 care before it is provided."

1 11. Section 125.3 of the Code provides, in pertinent part, that the Board may
2 request the administrative law judge to direct a licensee found to have committed a violation or
3 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
4 and enforcement of the case.

5 **Patient #V6483853**

6 12. On or about December 11, 2004, Respondent was assigned to the 7:00
7 a.m. to 7:00 p.m. shift in the ICU at Good Samaritan Hospital in Los Angeles, CA and assigned
8 to care for patient #V6483853, who was being treated for low blood pressure. Respondent was
9 monitoring the patient in "Lead I", the primary EKG lead. At about 0830 hours, the charge
10 nursed observed that the patient's monitoring was alarming and informed Respondent.
11 Respondent stated that the alarm had been sounding all day. The charge nurse suggested that
12 Respondent change the lead. At 0900 hours the monitor continued to alarm for intermittent
13 premature ventricular (PVC's) and there was no indication that the leads had been changed. At
14 0930 hours, there was a change in rhythm to ventricular tachycardia.

15 At approximately 0935 hours, a nurse heard the alarm from the patient's monitor
16 sounding at the central station. She paged Respondent and asked her to check the patient.
17 Respondent advised the nurse that the monitor had been sounding continuously and was not
18 accurate. At approximately 0945 hours, Respondent pushed the code blue button and began
19 CPR. The patient was expired at approximately 1001 hours.

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21 **FIRST CAUSE FOR DISCIPLINE**

22 (Incompetence and/or Gross Negligence)

23 13. Respondent is subject to disciplinary action under section 2761,
24 subdivision (a)(1) of the Code on the grounds of unprofessional conduct, in Respondent was
25 guilty of incompetence and/or gross negligence, within the meaning of California Code of
26 Regulations, title 16, section 1442, as defined in California Code of Regulations, title 16, section
27 1443.5, in that while on duty as a registered nurse at the Good Samaritan Hospital in Los
28 Angeles, California, she committed acts of incompetence and/or gross negligence. The

1 circumstances are as follows:

2 a. Respondent was grossly negligent in that she delayed the initiation of code
3 blue for fifteen (15) minutes.

4 b. Respondent was grossly negligent in that she failed to recognize
5 ventricular tachycardia on a monitored patient.

6 c. Respondent was grossly negligent in that she failed to monitor patient
7 #V6483853 in Lead II and check the alarm. The ICU's standard of care calls for the patients to
8 be monitored in Lead II.

9 d. Respondent was negligent in that she failed to act upon change of rhythm
10 on a continuously monitored patient in an appropriate manner.

11 e. Respondent was committed acts of gross negligence and incompetence
12 with regard to patient #V6483853 that were an extreme departure from the standard of care and
13 failed to provide nursing care as required or to exercise ordinary precaution in a single situation
14 which she knew or should have known could have jeopardized the client's health or life.
15 Respondent's act of gross negligence jeopardized the life of patient #V6483853. The patient
16 subsequently expired.

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18 **PRAYER**

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein
20 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

21 1. Revoking or suspending Registered Nurse License No. 240356, issued to
22 Carole Diane Huyck.

23 2. Revoking or suspending Public Health Nurse Certificate No. PHN19718,
24 issued to Carole Diane Huyck.


25 3. Ordering Carole Diane Huyck to pay the Board of Registered Nursing the
26 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
27 Professions Code section 125.3;

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4. Taking such other and further action as deemed necessary and proper.

DATED: 11/11/06


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant